

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROWE PLASTIC SURGERY OF NJ LLC,

Plaintiff,

-against-

LEADING EDGE ADMINISTRATORS,

Defendant.

Case No. 2:24-cv-09533-JKS-MAH

Hon. Jamel K. Semper, U.S.D.J.

Document Electronically Filed

Oral Argument Requested

NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law; and upon all pleadings and papers filed herein, Defendant Omni Administrators Inc. d/b/a Leading Edge Administrators (“Leading Edge”), by and through its undersigned counsel, Davis+Gilbert LLP, shall move this Court before the United States District Court Judge Jamel K. Semper, at the Martin Luther King Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on January 6, 2025, and a time to be set by the Court, or as soon thereafter as counsel can be heard, for an order (1) pursuant to Fed. R. Civ. P. 12(b)(1), dismissing with prejudice Count One of the Amended Complaint of Plaintiff Rowe Plastic Surgery of NJ LLC (“the “Complaint”) for lack of subject matter jurisdiction; (2) pursuant to Fed. R. Civ. P. 12(b)(6), dismissing with prejudice Counts One through Six of the Amended Complaint for failure to state a claim upon which relief may be granted; and (3) granting any other relief the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Judge Semper’s Judicial Preferences and Local Rule 7.1(e), a Proposed Order granting Leading Edge’s Motion is annexed hereto.

Dated: New York, New York
December 12, 2024

DAVIS+GILBERT LLP

By: /s/ Danielle C. Zolot
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*Attorneys for Defendant
Leading Edge Administrators*

CERTIFICATION OF SERVICE

I hereby certify that on December 12, 2024, the foregoing Notice of Motion was e-filed with the Clerk of the Court by using the CM/ECF system, which effectuated service upon the following counsel of record:

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/s/ Danielle C. Zolot

Danielle C. Zolot

Dated: December 12, 2024